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To: [Marc.Wolman@state.ma.us](#); [karen.regas@state.ma.us](#)
Cc: [Hambrick, Amy](#); [Valdez, Heather](#); [Spells, Charlene](#); [Mia, Marcia](#); [Dahl, Donald](#); [CN=Mae Wang/OU=R9/O=USEPA/C=US@EPA](#); [Kelly, Shaheerah](#); [McDonnell, Ida](#); [Bird, Patrick](#); [Lancey, Susan](#)
Subject: Re: Fw: Plymouth County Gasification Unit RFI
Date: Monday, July 30, 2012 5:14:32 PM

(A correction to my previous message)

Marc and Karen,

I have discussed the Plymouth County Sheriff's Department request with several of my colleagues at EPA.

The unit as described would be an Institutional Waste Incinerator (IWI), and fall under the OSWI Rule (40 CFR 60 Subpart EEEE). The definition of an institutional facility includes prisons (see 40 CFR 60.2977). However, in order to be an IWI, the unit must burn "Institutional Waste," and in our present rule, if the waste is used for energy recovery, it does not qualify as institutional waste. Therefore, under our current rule, the facility is not covered by Section 129.

Our current rule has been challenged in Court, and we will have to write a new rule, which probably will not contain this exemption.

Since it is unlikely that the new rule will be promulgated during the six month trial period, or even the 12 month period with the extension, we feel that during that period, the facility will not be affected by Section 129. Still, they should be made aware of the possibility that this could happen.

If the Prison does choose to buy the system, they will have to be aware that in the future, it could fall under a revised OSWI Rule.

We have also looked at whether the unit would be covered by the Area Source Boiler MACT. The Boiler MACT could apply to the energy recovery unit (water heater), but since that unit will burn gas, we feel the Boiler MACT does not apply.

Do any of you have any questions, or objection to sharing this with the Source? If not, we can discuss how to inform them. Let me know if you have nay questions.

Thanks,

Ian

From: Ian Cohen/R1/USEPA/US

To: Amy Hambrick/RTP/USEPA/US@EPA, Heather Valdez/R10/USEPA/US@EPA, Charlene Spells/RTP/USEPA/US@EPA, Marcia Mia/DC/USEPA/US@EPA, Donald Dahl/R1/USEPA/US@EPA, Marc.Wolman@state.ma.us, karen.regas@state.ma.us, Mae Wang/R9/USEPA/US@EPA, Shaheerah Kelly/R9/USEPA/US@EPA

Cc: Ida McDonnell/R1/USEPA/US@EPA, Patrick Bird/R1/USEPA/US@EPA

Date: 07/17/2012 12:11 PM

Subject: Re: Fw: Plymouth County Gasification Unit RFI

Hi All,

We met with representatives from IST Energy and the Plymouth County Sheriff's Department this morning to discuss a gasification project they are working on.

This system is owned and currently operated by IST Energy of Waltham, MA. It is located at the Plymouth County Correctional Facility where they plan to use it to take waste from the prison - mostly paper, plastic, and food scraps - gasify it, and use the gas to power a boiler which will help provide hot water to the prison.

IST originally had the system at their facility in Waltham, MA, and now have it at the prison for a 6 - month project to see how it works. This may be extended for another six month. After that, it may be sold, either to the Prison, or another buyer.

The system has 3 components: the first converts the waste into pellets; the second uses gasification to turn the pellets into a gas; and the third uses the gas, producing energy; and the third uses the gas to produce energy. It is self contained, but there are some air emissions.

They noted that the gasification system involves pyrolysis, but also does involve some combustion to heat the materials before they are turned into a gas.

The question we need to answer is whether they fall under Section 129. My initial guess is that they would be an Industrial Waste Incinerator, under the OSWI Rule.

I'm adding the Region 9 contacts since they said that they have a similar system at Edwards AFB, CA, so Mae and Shaheerah, please feel free to chime in.

They will provide me with a copy of the Powerpoint presentation they used at the meeting. I will forward it to you. (If you do not want to receive the powerpoint, please let me know.

Since this is a six-month project, obviously they would like a quick decision so they can get going, so I might like to get back to them soon. any thoughts you have will be appreciated.

Thanks,

Ian